



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

May 6, 1997

Reply to
Attn of: ECL-113

Nolan Jensen, Acting Manager
Environmental Restoration Program
U.S. Department of Energy
Idaho Operations Office
850 Energy Drive
Idaho Falls, Idaho 83401-1563

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Program Management

**Re: EPA Comments on Draft Engineering Evaluation/Cost Analysis for WAG 4
Miscellaneous Sites 1997 Non-Time Critical Removal Action**

Dear Mr. Jensen:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced draft Engineering Evaluation/Cost Analysis for WAG 4 (EE/CA) and is submitting the following comments. EPA received this document on April 28, 1997.

Issues that need to be resolved by the agencies prior to EPA concurrence on the draft EE/CA include; (1) the lack of a clear justification for the proposed removal actions, and (2) the lack of a detailed ARARs evaluation.

If you have any questions about these comments, please call me at (206)553-6903.

Sincerely,

Howard Orlean
WAG-4 Manager

cc: Shawn Rosenberger, DEQ-Idaho Falls
Allan Dudziak, DOE-ID
Dave Hovland, DEQ-Boise
Wayne Pierre, ECL-113

GENERAL COMMENTS

1. EPA is concerned that the draft EE/CA does not provide a clear justification for the proposed removal actions. Many of the sites for which soil removals are proposed appear to have contaminant concentrations which are already below established preliminary remediation goals (PRGs).
2. The evaluation of applicable or relevant and appropriate requirements (ARARs) is limited in scope. Several key Federal regulations including the Toxics Substances Control Act (TSCA) and Department of Transportation (DOT) regulations were not included in the evaluation.

SPECIFIC COMMENTS

1. Executive Summary, Page 1, Last Bullet --

Please re-word this sentence to be consistent with Page 1-1. Suggested wording is as follows: *"Radionuclide-contaminated soils that may be encountered at the CFA site during currently planned facility maintenance operations until the signature of the Operable Unit (OU) 4-13 Record of Decision (ROD)."*

2. Section 1.3.1.1, Page 1-8, Fourth Paragraph --

Please state whether quality assurance review was performed on the D&D data for CFA-08.

3. Section 1.3.2.2, Page 1-13, Top of Page --

Please list the types of contaminants at CFA-15, if they are known.

4. Section 1.3.3.1, Page 1-13, Bottom of Page & Page 1-14, Top of Page --

EPA is unclear as to the rationale for the proposed removal action at CFA-17. Future residential risks at this site are within the risk range. If data gaps exist at this site, what is the rationale for not evaluating these data gaps as part of the OU 4-13 comprehensive remedial investigation?

5. Section 1-5, Page 1-24, First Sentence --

This sentence is confusing. Suggest re-wording to; *"The EE/CA guidance states that a streamlined risk evaluation which identifies what current or potential exposures should be*

prevented be conducted in order to document that a removal action is necessary."

6. Section 1-5, Pages 1-24 through 1-29, Tables 1-6 through 1-9 --

Based upon Tables 1-6 through 1-9, the only site in which PRGs are exceeded is CFA-42. Therefore, EPA is uncertain as to what the justification is for the removal actions which are proposed for CFA-08, CFA-17 & CFA-47. If data gaps exist at these sites, the so-called "streamlined risk evaluation" is not complete in that the data gaps should be addressed prior to providing a risk-based justification for the proposed removal actions.

7. Section 2.3, First Paragraph, Bottom of Page 2-2, Top of Page 2-3 --

This paragraph is irrelevant in that the removal actions are not fund-financed. A more appropriate statement would be to state that DOE is the lead agency and has determined that the proposed removal action is non-time critical.

8. Section 3.3.4, Table 3-4, CFA-42 --

Table 3-4 and the accompanying description suggest that the Excavation and Disposal option is eliminated due to large volumes of soil. However, according to the description of site CFA-42 found in Section 1.3.4.1, the volume of contaminated soil left in place is still to be determined. Therefore the rationale for precluding the Excavation and Disposal option may not be valid. Please clarify.

9. Section 4.2.2, Page 4-2, Last Paragraph & Page 4-3, Bulleted Items --

There are many more than five Federal acts which comprise the universe of ARARs on CERCLA cleanup sites. Additional Federal acts which must be evaluated as ARARs for WAG-4 actions include among others: The TSCA which contains storage and disposal requirements for PCBs; the Uranium Mill Tailings Radiation Control Act (UMTRA) which contain health and environmental standards for uranium and thorium mill tailings; Department of Transportation Rules for the Transportation of Hazardous Materials; the Occupational Health and Safety Act; and the Endangered Species Act. Please include the above-referenced Federal acts in the EE/CA ARARs evaluation.

10. Page 4-9, Table 4-3-4, Evaluation results --

It is incorrect to list Alternative 5 (Excavation/Disposal) as having a medium effectiveness of reducing toxicity, mobility, or volume *through treatment*. Alternative 5 does not *treat* contaminants.

11. Page 4-15, Table 4-3-8, Cost estimates for Alternative 1 --

Please include a footnote in Table 4-3-8 which refers the reader to Appendix A for a more detailed description of the estimated capital costs for the No Action/Institutional Controls Alternative (Alternative 1). This should allow the reader to avoid questioning the fact that the estimated costs for Alternative 1 are less than the estimated costs for Alternative 5 (Excavation/Disposal).

12. Page 5-1, Section 5.1.1, Last Sentence --

Please delete this sentence. The term "containment treatment" is an oxymoron. Alternative 5 should have received a "low" score for the criteria of reduction of toxicity, mobility, or volume through treatment. See comment # 10 above.

13. Page 5-2, Section 5.1.5 --

At a minimum, an analysis of the no action alternative as compared to the on-site disposal option should be performed for the limited radionuclide-contaminated WAG-4 soils.

14. Page 5-3, Number 4 --

Please include in the EE/CA a description of the field screening activities and how those activities are designed to minimize waste generated during the removal actions.

15. Pages 5-4 through 5-9, Table 5-1 and 5-2 --

For those soils that contain PCBs the TSCA regulations are relevant and appropriate. Depending on the action taken (storage, treatment or disposal) they would be either chemical or action-specific ARARs. Please include the TSCA regulations in the ARARs tables.

In addition please include DOT regulations for off-site disposal actions, along with Occupational Safety and Health Administration regulations.